

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
ANDERSON / GREENWOOD DIVISION

PHILIP WADE GRIMES, PERSONAL )  
REPRESENTATIVE OF THE ESTATE )  
OF O.G., )

PLAINTIFF, )

VS. )

YOUNG LIFE, INC, INNER QUEST, )  
INC., AND ADVENTURE )  
EXPERIENCES, INC. )

DEFENDANTS )

**MOTION IN LIMINE OF DEFENDANT,  
INNER QUEST, INC., TO  
EXCLUDE TESTIMONY OF PLAINTIFF'S  
EXPERT, EDWARD M. PRIBONIC**

CASE NO. 8:16-CV-1410-HMH

Defendant, Inner Quest, Inc. (“Inner Quest”), moves the Court for an order *in limine* excluding the testimony of Edward M. Pribonic, P.E. (“Pribonic”), proffered expert for Plaintiff, inasmuch as the opinions of Mr. Pribonic lack reliability under Federal Rule of Evidence 702 and Daubert v. Merrell Dow Pharm., Inc., 509 U.S. 579, 587 (1993), on the grounds and based upon the authorities provided by Inner Quest in its memorandum in support of the motion, which is filed contemporaneously herewith.

This motion is based upon the pleadings and discovery in this case, Inner Quest’s motion for summary judgment, the Federal Rules of Evidence and Civil Procedure, applicable common and statutory law, and the memorandum of law and exhibits filed in support of the motion.

Greenville, SC

April 5, 2017

s/ W. Howard Boyd, Jr.

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